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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Open Network Architecture Tariffs)
of Bell Operating Companies)

CC Docket No. 92-91

COMMENTS

Sprint Communications Company LP hereby respectfully submits its comments in support of MCI's June 3, 1992 "Motion for Suspension of Procedural Dates" in the above-captioned proceeding. The unusual bifurcation of the ONA investigation into "public" and "proprietary" phases, and the overlap of issues in both phases, justify suspension of the current pleading cycle¹ on the BOCs' ONA direct cases.

As MCI correctly points out (Motion, p. 2), "the BOC direct case submissions contain numerous references to proprietary cost models such as SCIS and various aspects thereof, including SCIS options and the effect that particular changes in SCIS inputs will have on SCIS outputs." Thus, comments on the BOCs' direct cases will be generalized and likely incomplete because of the lack of information on the SCIS models used by the BOCs to price out their ONA rate elements. Because such comments will be of limited utility to the

¹The BOCs submitted their direct cases on May 18, 1992. Oppositions to these direct cases are due June 17; rebuttals to oppositions are due July 2.

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Commission, deferral of the June 17 deadline for submitting comments on the BOCs' direct cases pending further Commission decisions, BOC submissions, and intervenor review of SCIS-related information, would result in the more efficient use of scarce Commission and industry resources.

Deferral of the June 17 deadline will not result in harm to the BOCs, since the ONA rates at issue here are already in effect. Furthermore, as MCI notes (*id.*, p. 8), it is reasonable to assume that final determination by the Commission as to the reasonableness of the BOCs' ONA rates will not be made until the proprietary portion of the ONA investigation is completed. Accordingly, Sprint urges the Commission to grant MCI's Motion.

Respectfully submitted,

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June 8, 1992

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments" of Sprint Communications Company L.P. were sent via first-class mail, postage prepaid, on this the 8th day of June, 1992, to the below-listed parties:

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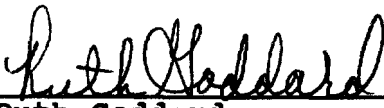
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